



Driving progress
through partnership

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September 30, 2024

Via ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS (MDL No. 3080)
Parties' Submission on the Status of State AG Track Plaintiff Fact Sheets**

Dear Judge Singh:

In accordance with Your Honor's September 6, 2024 Order (ECF No. 278), the parties submit this update regarding the State AG Track Plaintiff Fact Sheets (PFS).

The parties have exchanged initial State AG Track PFS proposals. On September 24, 2024, the parties met and conferred to discuss the substance of those initial proposals, identifying areas of preliminary agreement and disagreement. During this meeting, it was agreed that Plaintiffs would circulate edits to Defendants' proposed PFS. On September 25, Plaintiffs sent their edits. The following day, the Court issued its Order Regarding Fact Sheets for the Self-Funded Payer Track (ECF No. 291). This order addresses a number of the issues currently under discussion by the parties as to the State AG Track PFS proposals, and the parties are reviewing it to inform their continued negotiations.

The parties are scheduled to meet and confer again this week regarding the State AG Track PFS.

The parties jointly request leave to submit to the Court by October 11, 2024, either (i) a jointly proposed State AG Track PFS, or (ii) competing PFS proposals and position statements regarding any remaining disputed questions for the State AG Track PFS.

We thank the Court for its continued attention to this matter. Should this request be acceptable to Your Honor, the parties respectfully ask that this letter be "So Ordered" and entered on the docket.

Respectfully submitted,

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